

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>DATACELL EHF.,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Civil No. 1:14-cv-1658-GBL-TCB</b>
	)	
<b>VISA INC., VISA EUROPE LTD., and</b>	)	
<b>MASTERCARD INCORPORATED,</b>	)	
	)	
<b>Defendants.</b>	)	

**DEFENDANT VISA INC.'S MOTION TO DISMISS**

Defendant Visa Inc., by and through counsel, respectfully moves this Court for an order to dismiss the Complaint with prejudice pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure. The grounds for Visa Inc.'s motion are set forth in Defendant Visa Inc.'s Memorandum in Support of its Motion to Dismiss, which is incorporated herein along with the accompanying Request for Judicial Notice and a proposed order.

WHEREFORE, Visa Inc. respectfully requests that this Court grant its Motion to Dismiss, and grant any other relief that the Court deems appropriate.

Dated: May 8, 2015

Respectfully submitted,

/s/ Jacob S. Siler  
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**CERTIFICATE OF SERVICE**

I hereby certify that, on this 8th day of May, 2015, I have electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following counsel of record:

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Pursuant to the Division-Specific Electronic Case Filing Policies and Procedures, two courtesy copies of the foregoing pleading will be delivered to Chambers within one business day of the electronic filing.

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